

**From:** Gayle Richards [[mailto:gayle\\_richards@tjx.com](mailto:gayle_richards@tjx.com)]

**Sent:** Friday, February 26, 2016 11:31 AM

**To:** Monroe, Pamela

**Cc:** Gayle Richards

**Subject:** Response to Request for Advance Public Comment on Rules Related to Certificates of Site and Facility, Site 300

Ms. Monroe:

Thank you for the opportunity to provide comments on the Site 300 Rulemaking as it pertains to high pressure gas pipelines. Despite the 25 January 2016 date of the request, please be advised that we did not receive the request until 11 February 2016. I respectfully request that the deadline for submission be extended beyond 29 February 2016 to give the municipalities and members of the public a reasonable opportunity to contribute to this process.

We have reviewed the current Site 300 rules and the provisions specified in the Request for Comment and found them to be inadequate. Respectfully, we request that the following provisions be considered:

**1. Public and Private Drinking Water Wells**

- a. Avoidance of aquifers that are used for public and private drinking wells
- b. Identify impacts of blasting on groundwater for public and private drinking wells
- c. Require hydrogeological studies to support application
- d. Identify impacts and risks associated with hydrostatic testing
- e. Identify impacts of air pollution from surface facilities (compressor engines, compressor blowdowns, condensate tanks, storage tanks, truck loading racks, glycol dehydration units, amine units, separators, fugitive emission sources, etc.) on dug wells
- f. Testing and monitoring of public and private wells prior to construction (baseline) and periodically post construction; test for flow as well as contaminants (i.e., arsenic, radon, benzene, VOCs, etc.)

**2. Public Health and Safety**

- a. Current state (baseline) of the impacted Town's Emergency Management, Fire Department and Police Department capabilities
- b. Identify risks of proximity to high-tension electrical wires and other ignition sources; avoid EMI
- c. Identify Emergency Response Plans; training and equipment; ability of Town's to respond to wildfires and other disasters; Mutual Aid impacts, etc.
- d. Identify security requirements and associated risks
- e. Identify system shut-down procedures; identify risks associated with road structure and conditions, terrain, weather, etc.
- f. Require highest quality of pipe, considering health and safety impacts, not only population density
- g. Use and management of dangerous substances; major hazards assessment and management; pollution prevention; solid and chemical waste management
- h. Avoid steep-slopes; identify risks due to erosion, pipe cleaning and maintenance, etc.
- i. Current state (baseline) of roads and public right of ways; impacts to roads for logging, construction and maintenance activities
- j. Require road bonds prior to construction
- k. Audits and inspections during operations

**3. Air Pollution**

- a. **Require a Comprehensive Health Impact Assessment**
- b. Require surface facilities (compressor engines, compressor blowdowns, condensate tanks, storage tanks, truck loading racks, glycol dehydration units, amine units, separators, fugitive emission sources, etc.) to be constructed to control emissions and prevent air pollution
- c. Identify impacts to people, business, schools, local farms, surface waters, etc.
- d. Twelve months of air monitoring prior to operation to establish current state (baseline)
- e. Constant testing and monitoring for air pollution
- f. Guidelines for levels of pollutants that shuts down the surface facility
- g. Soil testing and monitoring to identify local conditions (baseline) and periodically after operation

**4. Noise, Vibration and Light Pollution**

- a. Identify current local conditions (baseline)
- b. Identify impacts to people, business, local farms, etc.
- c. Requirements of local ordinances
- d. Identify risks to homes, businesses and farms

**5. Socioeconomic**

- a. Assessment of Baseline Social, Economic and Environmental conditions
- b. Identify impacts to property values and abatement impacts on Town revenue
- c. Identify impacts to local businesses
- d. Identify local Master Plans; address impacts to Town planning and development
- e. Require independent study of local economic impacts due to effects of project on Public and Private Drinking Wells, Public Health and Safety, Air Pollution, Noise and Light Pollution, Aesthetics and Deforestation, Threatened and Endangered Species, etc.
- f. Require local resource taxes be paid by the applicant to include Timber Tax, Excavation Taxes, Local Permitting Fees, Change of Use (e.g., Current Use), etc.
- g. Avoid disproportionate impact on low income and disadvantaged or vulnerable groups

**6. Land Use, Recreation and Aesthetics**

- a. Identify impacts and risks
- b. Identify impacts due to deforestation
- c. Avoid land with current conservation easement or with non-development deed restrictions
- d. Protect cultural property and heritage

**7. Threatened and Endangered Species**

- a. Avoid Endangered, Threatened and Species of Special Concerns
- b. Avoid Highest Ranked Wildlife Habitat

**8. Alternatives**

- a. Identify and consider feasible environmentally and socially preferable alternative locations
- b. Avoid use of Eminent Domain or condemnation
- c. Consider efficient production, delivery and use of energy

In addition, we submit the attached reference materials for your consideration:

1. *Governor's Pipeline Infrastructure Task Force (PITF) Report*, dated February 2016, by the Pennsylvania Department of Environmental Protection Pipeline Infrastructure Task Force <http://files.dep.state.pa.us/ProgramIntegration/PITF/PITF%20Report%20Final.pdf>

2. *A Brief Review of Compressor Stations*, dated November 2015, by the Southwest Pennsylvania Environmental Health Project <http://www.environmentalhealthproject.org/wp-content/uploads/2014/05/A-Brief-Review-of-Compressor-Stations-.pdf>
3. *Summary on Compressor Stations and Health Impacts*, dated 24 February 2015, by the Southwest Pennsylvania Environmental Health Project <http://www.environmentalhealthproject.org/wp-content/uploads/2012/03/Compressor-station-emissions-and-health-impacts-02.24.2015.pdf>

If you have any questions, please do not hesitate to contact me.

Thanks,  
Wendy

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